

### DEPARTMENT OF DEFENSE DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE 241 18<sup>TH</sup> STREET SOUTH, SUITE 101

ARLINGTON, VA 22202-3405

July 15, 2014

### MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE PRIVACY OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in DITPR SystemS -Accepted

Thank you for completing your review of Social Security Number (SSN) use within your systems. After review, the Defense Privacy and Civil Liberties Office has accepted your justifications for continued use of the SSN (see attached). Further review of these systems will not be required under DoD's current SSN Reduction plan. While these systems have been identified as still requiring collection, maintenance, and use of the SSN, you must continue to ensure that this data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards. Please maintain a copy of your justification and this memo in your records.

If you have any questions, please contact Ms. Viki Halabuk at (703) 571-0070 or e-mail viki.l.halabuk.civ@mail.mil.

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Samuel P. Jenkins Director for Privacy

Attachment: As stated.

SSN Use Justification Memo for Defense Finance and Accounting Service July 15, 2014			
DITPR Number	System Name	Acronym	Accepted Justification
30	Departmental Cash Management System	DCMS	(8) Computer Matching and (11) Legacy System Interface
93	Defense Civilian Pay System	DCPS	(4) Interactions With Financial Institutions, (7) Federal Taxpayer Identification Number, and (8) Computer Matching
98	Defense Retireee and Annuitant Pay System	DRAS	(1) Geneva Conventions Serial Number and (7) Federal Taxpayer Identification Number
853	myInvoice		(7) Federal Taxpayer Identification Number and (8) Computer Matching

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## DEFENSE FINANCE AND ACCOUNTING SERVICE ARLINGTON

4800 MARK CENTER DR. ALEXANDRIA, VA 22350-3000

DFAS-ZT August 5, 2013

#### MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DFAS-CL R&A DRAS Mainframe Applications

The Defense Finance and Accounting Service (DFAS) Information and Technology (I&T) Payroll Services Division (PSD) supports Retired & Annuitant (R&A) Pay Operations mainframe applications that store Personally Identifiable Information (PII), to include SSNs. These mainframe applications known as the Defense Retired & Annuitant Pay System (DRAS) are used to establish, maintain and pay military retirees and their beneficiaries. The DRAS system is a legacy mainframe system that currently uses SSNs as the primary source of identifying individual military retirees and their beneficiaries. Therefore, the SSN is currently the only unique identifier that the DRAS can utilize for payroll processing. The DRAS applications or sub-systems are listed in Appendix A.

The primary justification for the continued use of SSNs within DRAS is Department of Defense Issuance (DoDI) 1000.30, Enclosure 2, Paragraph 2.c.(11) based on DRAS system requirements that forego the ability to alter the current system to remove SSNs. Justification is also warranted via DODI 1000.30, Enclosure 2, Paragraph 2.c.(1) based on all US military branches of service using the SSN as the Geneva Convention serial number for primary tracking of military members. Justification is also warranted via DODI 1000.30, Enclosure 2, Paragraph 2.c.(7) based on the fact that R&A payments are subject to Federal and State income tax collections.

The authority for DRAS to collect, process, and disseminate PII is found in the Department of Defense Financial Management Regulation 7000.14-R volume 7B, chapters 1,2,3,4,7,11,13,14,19,23,24,25,26,17,28,29,30,31,32,42,44,45,46,54,59,60,61,63 and 64.

Current safeguards in place to protect SSNs within DRAS include the following:

- 1. Requiring DoD CAC logon to access DFAS network
- 2. Requiring DoD CAC logon to access Defense Information Systems Agency (DISA) mainframe
- 3. User Identification (ID) and password required to access DRAS
- 4. Limiting access to DFAS-CL R&A or IT Production Control employees

<u>www.dfas.mil</u> Your Financial Partner @ Work The System Of Record Notification ID is T7347b and Last Privacy Impact Assessment was June 14, 2013.

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Jerry S. Hinton
Director, Information and Technology

Attachment: As stated